

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of New Mexico

09 JUN -5 PM 4:35 CBE

CLERK - LAS CRUCES

United States of America

v.

Carl E. Haese

Case No.

09-1582 mj

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 07/11/2008 in the county of Dona Ana in the State and District of New Mexico, the defendant violated 18 U. S. C. § 1343, an offense described as follows:

From on or about July 11, 2008 to, on or about April 9, 2009, the defendant, Carl E. Haese, having devised or intending to devise a scheme or artifice to defraud, or for obtaining money and property by means of false or fraudulent pretenses, representations, or promises, transmitted or caused to be transmitted wire communications in interstate or foreign commerce for the purpose of executing the same scheme or artifice.

This criminal complaint is based on these facts:

See attached.

☒ Continued on the attached sheet.

Todd Blair

Complainant's signature

Todd Blair - Special Agent - FDI-GCI

Printed name and title

Sworn to before me telephonically and subscribed at that time.

Date: 06/03/09

City and state:

Las Cruces Nm

Karen B. Molzen

KAREN B. MOLZEN
U.S. MAGISTRATE JUDGE

Printed name and title

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Carl E. Haese ("Haese") — owner and operator of The Haese Clinic of Integrative Medicine, 532 North Telshor Boulevard, Suite G, Las Cruces, New Mexico ("the Haese Clinic") — is involved in a conspiracy and scheme to defraud patients and obtain money by falsely representing to patients that he has cured 100% of the 3,000 people he claims to have treated for Lyme Disease. On or about July 11, 2008 to, on or about April 9, 2009, Haese has purported to diagnose Lyme disease in his patients by using the Bradford Variable Projection High Resolution Microscope ("the Bradford Microscope"). Haese claims to treat Lyme Disease in his patients with an intravenous cocktail containing Dioxychlor and Sulfoxime. The Bradford Microscope is a medical device that is not listed or recognized by the Food and Drug Administration ("FDA") as a means to diagnose Lyme Disease. Similarly, neither Dioxychlor nor Sulfoxime are approved by the FDA to treat Lyme Disease, or any other disease. In January, 2009, two patients informed me that they paid Haese — using credit cards — in excess of \$5000.00 for this Lyme Disease treatment. The credit card transactions were transmitted by means of wire communication and interstate commerce.

On April 9, 2009, FDA-Office of Criminal Investigations and the Las Cruces Police Department executed a federal search warrant at the Haese Clinic. The search warrant yielded a Bradford Microscope, patient files, Dioxychlor, and Sulfoxime. A review of the patient files recovered from the Haese Clinic indicated that numerous Haese Clinic patients had been diagnosed and treated for Lyme Disease in the aforementioned manner.

On May 5 and 7, 2009, I interviewed two additional patients of Haese ("Patient #3" and "Patient #4"). Patient #3 and Patient #4 were identified from the patient files that were recovered during execution of the search warrant. Both of these patients told me that Haese examined their blood under the Bradford Microscope and confirmed they had Lyme Disease.

Haese prescribed Patient #3 and Patient #4 a series of IV applications. Patient #3 told me that the

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treatments made her extremely ill and were unsuccessful in treating the disease. Patient #3 paid for the treatment by presenting a Visa credit card as payment in the amount of \$5,100. That credit card transaction was transmitted by means of wire communication and interstate commerce.

Patient #4 told me that Haese advertised he had successfully treated and cured over 3,000 patients with Lyme disease by using the aforementioned diagnosis and treatment methods. Furthermore, Haese told Patient #4 that Lyme Disease is contagious and recommended her spouse be tested for Lyme Disease. Patient #4's spouse followed the recommendation of Haese and agreed to be tested for Lyme Disease by Haese. Patient #4 advised the Lyme Disease treatments were unsuccessful in treating the disease. Patient #4 and her spouse were charged approximately \$10,000 for both treatments. Patient #4 paid for the treatments via Elan Financial Services credit card. That credit card transaction was transmitted by means of wire communication and interstate commerce.



Todd Blair



United States Magistrate Judge